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and TPG Credit Opportunities Investors, L.P.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	Chapter 11
In re	:	
	:	Case No. 05-44481 (RDD)
DPH HOLDINGS CORP., <u>et al.</u> ,	:	
	:	(Jointly Administered)
Debtors.	:	
----- X	:	

JOINDER OF TPG CREDIT OPPORTUNITIES FUND, LP. AND TPG CREDIT OPPORTUNITIES INVESTORS, L.P. TO THE RESPONSE OF THE TT GROUP TO THE REORGANIZED DEBTORS' FORTY-SECOND OMNIBUS CLAIMS OBJECTION

TPG Credit Opportunities Fund, L.P. and TPG Credit Opportunities Investors, L.P. (collectively, "TPG"), by and through their undersigned counsel, hereby joins the Response of the TT Group to the Reorganized Debtors' Forty-Second Omnibus Claim Objection (the "TT Group Response") in connection with the *Reorganized Debtors' Forty-Second Omnibus Objection Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 to (I) Modify and Allow Certain (A) Claims Partially Satisfied by Cure Payments and (II) Disallow and Expunge (A) A Certain Workers' Compensation Claim and (B) Certain Books and Records Claim* (the "Forty-Second Omnibus Objection"). In support hereof, TPG states as follows:

1. TPG is the owner a portion of each of the following timely filed prepetition claims against the Reorganized Debtors each filed by members of the TT Group: Claim Nos. 8372, 9037, 8878 and 16255 (collectively, the "TT Group Claims"). By the Forty-Second

Omnibus Objection the Reorganized Debtors allege that they partially satisfied the TT Group Claims with certain cure payments and that the TT Group Claims should be reduced and modified to reflect those payments.

2. By the TT Group Response, the TT Group explained that they are continuing their efforts, and attempting to work with the Debtors' business representatives, to determine whether such cure payments have been made.

3. As the sole basis for the objection to the TT Group Claims in the Forty-Second Omnibus Objection is that cure payments were made to TT Group to reduce the TT Group Claims, and as the information regarding the receipt of such cure payments is in the sole purview of the TT Group, TPG hereby defers to the TT Group's reconciliation efforts to determine if such cure payments were made.

4. While the TT Group is still in the process of reviewing and reconciling the TT Group Claims in light of the Debtors' assertions in the Forty Second Omnibus Objection, TPG hereby joins the TT Group's reservation of rights with respect to the TT Group Claims, including and without limitation, the right to supplement, modify and/or withdraw this response in whole or in part and to assert any and all such further responses to the Forty-Second Omnibus Objection, including any response with respect to the legal and factual basis for disputing such relief.

WHEREFORE, TPG respectfully requests that any Order entered by the Court in connection with the Forty-Second Omnibus Objection preserve for TPG its rights to respond to the Forty-Second Omnibus Objection insofar as the TT Group Claims are concerned, and for such other and further relief as is just and proper.

Dated: February 18, 2010

MANDEL, KATZ & BROSNAN LLP

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